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Counsel for Defendant TUIPULOTU

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

NAIKANO TUIPULOTU,

Defendant.

Case No.: 4:24-mj-70198 MAG

**STIPULATION AND ORDER TO
CONTINUE STATUS CONFERENCE,
EXCLUDE TIME, AND EXTEND
DEADLINES UNDER THE SPEEDY
TRIAL ACT AND FED R. CRIM. P. 5.1
TO JUNE 7, 2024**

IT IS HEREBY STIPULATED, by and between the parties to this action that the status hearing for defendant Naikano Tuipulotu scheduled for May 15, 2024, before the duty magistrate judge, be continued to Friday, June 7, 2024, at 10:30 a.m. before the duty magistrate for status or arraignment on information. The reason for the continuance is as follows: Defense counsel received additional discovery on Friday, May 10, 2024, and is still reviewing it. Counsel needs time to complete its review and continue to discuss the discovery and case in general with her client. The parties also anticipate discussing a potential resolution which may result in a waiver of indictment and

arraignment on an information. The continuance is sought under the Speedy Trial Act. The parties agree and stipulate that the time until June 7, 2024, should be excluded, under 18 U.S.C. §3161(H)(7)(A) and (B)(iv), for effective preparation of counsel because the ends of justice served by the granting of the continuance outweigh the best interests of the public and defendant in a speedy and public trial for the reasons described above.

The parties further stipulate that, with the consent of the defendant, there is good cause for extending the time limits for a preliminary hearing under Federal Rule of Criminal Procedure 5.1 and for extending the 30-day time period for an indictment under the Speedy Trial Act for the reasons discussed above. See Fed. R. Crim. P. 5.1; 18 U.S.C. § 3161(b).

IT IS SO STIPULATED.

Dated: May 13, 2024

JODI LINKER
Federal Public Defender
Northern District of California

/S/

JOYCE LEAVITT
Assistant Federal Public Defender

Dated: May 13, 2024

ISMAIL J. RAMSEY
United States Attorney
Northern District of California

/S/

JONAH ROSS
Assistant United States Attorney

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
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UNITED STATES OF AMERICA,

Plaintiff,

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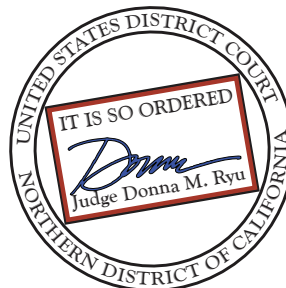
**ORDER TO CONTINUE STATUS
CONFERENCE, EXCLUDE TIME, AND
EXTEND DEADLINES UNDER THE
SPEEDY TRIAL ACT AND FED R.
CRIM. P. 5.1 TO JUNE 7, 2024**

GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that the status hearing for defendant Naikano Tuipulotu, currently scheduled for May 15, 2024, at 10:30 a.m., is continued to June 7, 2024, at 10:30 a.m., before the duty magistrate for status.

IT IS FURTHER ORDERED that the time until June 7, 2024, is hereby excluded from the Speedy Trial Act, under 18 U.S.C. §3161(H)(7)(A) and (B)(iv), for effective preparation taking into account due diligence. The Court finds that the ends of justice served by the granting of the continuance outweigh the best interests of the public and the defendant in a speedy and public trial. The Court further finds good cause for extending the time limits for a preliminary hearing under Federal Rule of Criminal Procedure 5.1 and extending the 30-day time period for an indictment under the Speedy Trial Act for the reasons discussed above. *See* Fed. R. Crim. P. 5.1; 18 U.S.C. § 3161(b).

IT IS SO ORDERED.

Dated: May 13, 2024



HON. DONNA M. RYU
Chief United States Magistrate Judge